

Remarks

Applicants respectfully request reconsideration of the present application in view of the above amendments and following remarks. Claims 1-3 and 10 have been amended. No claims have been cancelled or added. Therefore, claims 1-15 remain pending in the present application.

Claims 1-10 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,263,386 to Campbell et al. ("the Campbell reference"). In this portion of the Final Office Action, the Examiner also contends that claims 11 and 12 are anticipated by the Campbell reference. *See Final Office Action*, pg. 4. Thus, Applicants will assume for the purpose of this response that the Examiner also intended to reject claims 11 and 12 based upon the Campbell reference. Applicants respectfully traverse the rejection of claims 1-12.

Amended independent claim 1 is directed to an anti-rotation guide for a valve lifter for an internal combustion engine having a camshaft disposed within an engine block of the engine, and a valve train. The anti-rotation guide includes a sleeve portion and an anti-rotation feature. The sleeve portion includes an inner surface, an outer surface, a first end and a second end. The anti-rotation feature is fixedly coupled to one of the first end and the second end of the sleeve portion for cooperating with the lifter to prevent axial rotation of the lifter within the guide. The sleeve portion is oriented when installed from an opening of a bore in the engine proximate the camshaft. The first end of the sleeve portion is

adjacent to the camshaft and the second end of the sleeve portion is adjacent to the valve train.

The Campbell reference does not teach or suggest an anti-rotation guide having an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion for cooperating with a valve lifter to prevent axial rotation of the lifter within the guide as recited in amended claim 1. In rejecting claim 1, the Examiner stated that the lifter gallery (12) in the Campbell reference teaches the sleeve portion and the pair of raised hat sections (42) teach the anti-rotation feature set forth in claim 1. See *Final Office Action*, pgs. 2, 3, 6. As best seen in FIGS. 3 and 4, the raised hat sections (42) are integrally formed in the retainer clip (39), and the retainer clip (39) is mounted to the upper end of the lifter body (27). See *Campbell*, Col. 2, lines 47-50, 52-58. In operation, the retainer clip (39) reciprocates along with the lifter body (27), wherein one of the hat sections (42) slides within a slot (51) formed in the lifter gallery (12). See *Campbell*, Col. 2, lines 67-68; Col. 3, lines 1-2, 20-23. Since the raised hat sections (42) move relative to the lifter gallery (12), the raised hat sections (42) are not fixedly coupled to one of a first end and a second end of the lifter gallery (12). For at least this reason, Applicants request that the rejection of claim 1 be withdrawn.

Furthermore, the Campbell reference does not teach or suggest a sleeve portion being oriented when installed from an opening of a bore in an engine as recited in claim 1. As mentioned above, the Examiner stated that the lifter gallery (12) in the Campbell reference teaches the sleeve portion recited in claim 1. The Campbell reference states that the lifter gallery (12) is located on the inner wall of

a cylinder bank (14). See *Campbell*, Col. 2, lines 7-11; FIG. 1. However, nothing in the Campbell reference indicates that the lifter gallery (12) is installed from an opening of a bore in the engine. The Campbell reference appears to indicate that the lifter gallery (12) is formed as an integral part of the engine, such as by machining, not as a separate component that is oriented when installed from an opening of a bore in the engine. See *Campbell*, Col. 2, lines 9-11.

For at least the aforementioned reasons, Applicants submit that the Campbell reference does not teach or suggest all of the limitations included in claim 1. Applicants request that the rejection of claim 1 be withdrawn. As claims 2-9 depend from claim 1, these claims are also not taught or suggested by the Campbell reference for at least the same reasons set forth with respect to claim 1. Thus, Applicants request that the rejection of claims 2-9 be withdrawn.

Dependant claim 2 further distinguishes the present invention from the Campbell reference. Claim 2 states that the diameter of the outer surface of the sleeve portion is selected such that the guide is configured to be press-fit into the engine bore. As stated above, the Examiner stated that the lifter gallery (12) in the Campbell reference teaches the sleeve portion. First, the Campbell reference does not disclose that the lifter gallery (12) is positioned within an engine bore. Instead, the Campbell reference states that the lifter gallery (12) is located on the inner wall of a cylinder bank (14). See *Campbell*, Col. 2, lines 7-11; FIG. 1. Second, the Campbell reference does not specify that the diameter of the lifter gallery (12) is selected so that the guide is configured to be press-fit

into an engine bore. For this additional reason, Applicants request that the rejection of claim 2 be withdrawn.

Amended independent claim 10 is directed to an internal combustion engine having a camshaft and a valve train and a valve lifter. The engine includes an anti-rotation guide for receiving the valve lifter. The anti-rotation guide includes a sleeve portion and an anti-rotation feature. The sleeve portion includes an inner surface, an outer surface, a first end and a second end. The anti-rotation feature is fixedly coupled to one of the first end and the second end of said sleeve portion for cooperating with the lifter to prevent axial rotation of the valve lifter. The sleeve portion is oriented when installed from an opening of a bore in the engine proximate the camshaft. The first end of the sleeve portion is adjacent to the camshaft and the second end of the sleeve portion is adjacent to the valve train.

For at least the same reasons set forth with respect to claim 1, Applicants submit that the Campbell reference does not teach or suggest all of the limitations included in claim 10. Specifically, the Campbell reference does not teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion for cooperating with a valve lifter to prevent axial rotation of the lifter as recited in claim 10. Also, the Campbell reference does not teach or suggest a sleeve portion being oriented when installed from an opening of a bore in an engine as recited in claim 10. Applicants request that the rejection of claim 10 be withdrawn.

Claim 13 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference in view of U.S. Patent No. 4,173,954 to Speckart ("the Speckart reference").

Claim 13 is directed to the anti-rotation guide recited in claim 1 wherein the anti-rotation feature includes a flap. The Speckart reference includes a pair of lifter mechanisms (20, 34) that are prevented from rotating relative to one another by a locking bar (60) that passes through slots (47, 57) defined in the body of each of the lifter mechanisms (20, 34). See *Speckart*, Col. 1, lines 54-59; FIG. 1. Applicants submit that the Speckart reference fails to teach or suggest the limitations that were lacking in the Campbell reference. In particular, the combination of the Campbell and Speckart references fails to teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion for cooperating with a valve lifter to prevent axial rotation of the lifter within the guide and the sleeve portion being oriented when installed from an opening of a bore in an engine as recited in claim 1. For at least these reasons, Applicants request that the rejection of claim 13 be withdrawn.

Claim 14 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference in view of U.S. Patent No. 4,448,155 to Hillebrand et al. ("the Hillebrand reference").

Claim 14 is directed to the anti-rotation guide recited in claim 1 wherein the anti-rotation feature includes an orifice flat. As with the Campbell reference, the Hillebrand reference fails to teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion for cooperating

with a valve lifter to prevent axial rotation of the lifter within the guide and the sleeve portion being oriented when installed from an opening of a bore in an engine as recited in claim 1. Since claim 14 includes all of the limitations included in claim 1, Applicants submit that claim 14 is not taught or suggested by the references of record for at least the same reasons set forth with respect to claim 1. Applicants request that the rejection of claim 14 be withdrawn.

Claim 15 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference.

Claim 15 is directed to the anti-rotation guide recited in claim 1 wherein the sleeve portion is removable from the bore in the engine. As stated above, the Campbell reference fails to teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion for cooperating with a valve lifter to prevent axial rotation of the lifter within the guide and the sleeve portion being oriented when installed from an opening of a bore in an engine as recited in claim 1. Since claim 15 includes all of the limitations included in claim 1, Applicants submit that claim 15 is not taught or suggested by the references of record for at least the same reasons set forth with respect to claim 1. Applicants request that the rejection of claim 15 be withdrawn.

Conclusion

In view of the above, Applicants submit that claims 1-15 are in condition for allowance and such allowance is respectfully requested. Should the Examiner feel that any unresolved issues remain in this case, the undersigned

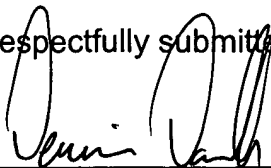
may be contacted at the telephone number listed below to arrange for an issue resolving conference.

Applicants do not believe that any fee is due at this time. However, the Commissioner is hereby authorized to charge any fee that may have been overlooked to Deposit Account No. 10-0223.

Respectfully submitted,

Dated: _____

11/20/05



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